

Webinar
AB 2588 “Hot Spots” Emission Inventory Criteria and Guidelines Regulation
Proposed Amendments

Submitted Written Questions & Comments Log

Webinar Date: April 30, 2020

Webinar Recording: <https://attendee.gotowebinar.com/recording/1667797917722627086>

Webinar Slides and Materials: <https://www.arb.ca.gov/ab2588/2588guid.htm>

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Notes for the Questions & Comments Log:

1. The log below displays written questions and comments about the proposed regulation amendments submitted into the webinar’s question box. Please note that questions regarding the webinar logistics (e.g., the call-in number, availability of a webinar recording, etc.) are not included.
2. Staff made some minor corrections for typographical errors, but did not otherwise edit the content of the questions or comments related to the proposed amendments.
3. CARB staff provided verbal responses to these questions and comments during the webinar’s questions and answer (Q&A) session. To hear staff’s responses, please access the recording at the link above.
4. In general, staff responded to questions and comments in the order they were received. However, since many questions were submitted during the presentation or shortly after the start of the Q&A session, the time when staff responded may be significantly later than the "Time Submitted" shown below.
5. Questions or comments provided verbally during the webinar are not included in the log below, but they are available for review in the webinar recording.

AB 2588 “Hot Spots” Proposed Amendments Webinar
Written Questions & Comments Log

Submitted By	Time Submitted	Question or Comment
Mike Garabedian	09:52:36 AM PDT	What regulation is in effect or is being considered for Public Operated Treatment Works (sewer plants)?
Mike Garabedian	09:53:53 AM PDT	What regulation is in effect or is being considered for railyards, and specifically the Roseville Railyards?
Mike Garabedian	09:54:58 AM PDT	What regulation is in effect or is being considered for Publicly Owned Treatment Works (sewage treatment plants)?

Submitted By	Time Submitted	Question or Comment
Daniel Beck	10:02:18 AM PDT	What is a stationary portable diesel engine? Seems contradictory. Are you saying portable engines used at stationary sites?
Raymond Rodriguez	10:03:52 AM PDT	Are you proposing the portable equipment owner to make the AB2588 reporting or the company that rents the equipment for 15 days?
David Rothbart	10:15:18 AM PDT	Can you explain how facilities can use sector-specific lists to identify a shorter list of compounds that must be quantified rather than the full Appendix A-1 list? This is especially important for the waste sector that cannot rely on MSDS sheets to estimate emissions of compounds without laboratory methods.
Raymond Rodriguez	10:24:46 AM PDT	Source testing approved by State Board or Local Air District?
Jennifer Border	10:36:41 AM PDT	On the 100 gallon threshold for a Tier 4 diesel engine, is that a Tier 4 final engine?
Jeremias Szust	10:40:08 AM PDT	The updated guideline allows districts to give consideration to cumulative facility impacts for a facility's inclusion in AB2588 - is there a plan to implement a state-wise procedure for these considerations (i.e. AB617 Selected Communities), or will this be left for the districts to decide?
Sarah Wade	10:40:19 AM PDT	Will CARB be working with CAPCOA to establish emission factors for the newly proposed chemicals for A-I?
Berna Watson	10:40:54 AM PDT	Who has the enforcement this regulation
Todd Tamura	10:41:00 AM PDT	It is unclear when the final proposed language of the revisions will be available for us to see
Km Burns	10:41:07 AM PDT	Board adoption in late 2020--correct?
Betty Chu	10:41:47 AM PDT	What are the list of substances that is required to be reported for electricity generation?
Gary Jones	10:41:59 AM PDT	What is the threshold for reporting for printing operations? Is it a chemical specific threshold?
Stephen Jepsen	10:42:02 AM PDT	What time on May 21 are comments due?
Emily Clark	10:42:04 AM PDT	Regarding Diesel engines - so we need to report diesel use?
Rania Serieh	10:42:13 AM PDT	Will Air Districts be required to revisit their AB 2588 list to reevaluate facilities that are currently exempt under the current regulation appendix E threshold, e.g., crematories < 300 bodies/yr?
Kraig Kurucz	10:43:08 AM PDT	Will CARB make the list of chemicals in Appendix A available in Excel format and with CAS numbers where they exist?
Gary Jones	10:43:27 AM PDT	What assistance is going to be provided to small businesses to help them report? Many small

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		businesses do not have the technical or economic resources to meet the requirements.
Steve Risotto	10:43:32 AM PDT	What pollutants are defined as "criteria" under AB 617? It was suggested by one speaker that chromium is a criteria pollutant.
Samuel Oktay	10:43:53 AM PDT	Many Districts use HARP to enter and report emissions. When will HARP be revised to incorporate the proposed changes. Samuel J Oktay, PE MDAQMD
Steven Yang	10:43:56 AM PDT	How will ARB determine when is it necessary to apply the two-step process for source testing?
Steve Risotto	10:44:39 AM PDT	What specific criteria were used to determine that substances within the "functional group categories" are TACs?
Gary Jones	10:45:32 AM PDT	In lieu of imposing these requirements on businesses, why can't the district conduct statistically significant sampling of representative businesses and extrapolate the results?
Steve Risotto	10:45:49 AM PDT	Has ARB evaluated whether the "functional group" substances can be emitted to air (e.g., fluoropolymers) or are used in CA?
Todd Osterberg	10:45:49 AM PDT	Todd Osterberg from Chevron: Slide 33 With regard to emissions quantification/source testing; How will scenarios when there is no approved source test method or emissions factor?
Cameron Kostigen Mumper	10:45:53 AM PDT	Can you explain the qualitative component in the two step process in App D in a little more detail.
Truc Ngo	10:46:33 AM PDT	Why don't we do 'clinical trial' testing for chemical products to ascertain its health effect prior to allowing its public usage? Similar to FDA products approval. It would save cost and headaches to businesses and not drive them out to other States or out of US (and to China instead).
Carolyn Ginno	10:46:42 AM PDT	How does the first step of the 'two step' process work? How does a 'qualitative' survey identify the specific list of constituents that then must later be quantitatively tested/monitored?
Scott Weaver	10:46:43 AM PDT	The presentation references changes to Appendix B and Appendix D. Did not see those proposed changes posted to your website. When might we expect to see those released?
Steven Yang	10:46:51 AM PDT	Given the impact of the economic downturn on government and business alike and the very large expansion of compounds, why has CARB not considered a phase-in approach, prioritizing

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		substances based on risk, taking into account likelihood and magnitude of impact?
Steve Risotto	10:47:10 AM PDT	Please explain the "default risk factors?" ARB is developing.
Amy Kyle	10:47:56 AM PDT	Who is responsible to ensure that MSDS or SDS that facilities are to be relied upon are accurate and fully disclose substances in materials?
Steven Yang	10:48:38 AM PDT	Will ARB be developing emission factors for compounds which are not source tested? If so, how will the value of emission factors be determined?
Mike Buckantz	10:49:16 AM PDT	Did I understand that you mentioned earlier that fugitive particulate emissions should be based on total particulate instead of fine particulate? Fine particulate would seem to make the most sense because finer particles may be respirable while coarse particles are likely not respirable?
Alison Torres	10:49:31 AM PDT	Follow-up question on the diesel engine CTR reporting criteria- If a tier 4 engine operates more than 5 hours, but uses less than 100 gallons, is reporting required?
Carolyn Ginno	10:50:14 AM PDT	Trying to understand what to expect at the facility level for the implementation of this approach. Thank you!
Kim Sumner	10:50:15 AM PDT	Bill Widger you mentioned proposed updates Mobile source that stay on sited must be added in AB2588 would Ag facilities be required to add their diesel vehicles?
Sahar Osman-Sypher	10:51:09 AM PDT	Can you provide more detail on the basis for selecting the three proposed chemical categories for the functional grouping concept? It was indicated that the EPA SNURs list is one source, was there any other basis for selecting these 3?
Adam Harper	10:51:26 AM PDT	When will all of the proposed regulatory documents changes be available for review. Discussion has covered many changes which don't appear to be within today's release of attached materials.
Deyadira Arellano	10:51:34 AM PDT	Is there current or proposed plan to measure cumulative impacts by the state or local districts?
Frank Caponi	10:51:36 AM PDT	Frank Caponi: The more toxics and equipment you add to the program, the higher the risk will become for the same operation. To you see this becoming like Prop. 65, where everything becomes a problem, or will at some point the risk management part of this program need to be revisited.

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Gary Wannlund	10:52:53 AM PDT	The number of chemicals that are reportable in appendix A-1 is about 900, if we have 300 SDS to check let's say an average of 5 listed product. That would require 269,995 individual searches. This does not seem feasible to capture all possible reportable substances.
Eric Carlson	10:53:45 AM PDT	Please expand upon time increments/schedule of reporting CTR vs. AB2588 (annual vs. quadrennial)?
Michael Escarcega	10:54:45 AM PDT	Is the 10 ton/yr criteria pollutant trigger based on a single criteria pollutant or cumulative criteria pollutant total. Mike Escarcega
Seong Kim	10:54:47 AM PDT	I'm curious with the rationale of why the hours of operation for Tier 4 and Tier 0 diesel engines in Appendix E are the same. I believe it's set as 5 hours of operation.
Natasha Meskal	10:56:55 AM PDT	Please add the CAS# whenever the chemical is mentioned, specifically in Appendix C.
Kim Burns	10:57:37 AM PDT	If a facility emits <4 TPY of criteria pollutants but has a diesel engine that combusts greater than 30 gallons/year, the facility would be subject to ab 2588 - correct?
Natasha Meskal	10:57:46 AM PDT	Please expand the Appendix A for toxic families such as "Chromium, hexavalent (and compounds) including but not limited to" by including as many as possible compounds that contain the chemical in question by CAS#s (such as currently listed for "Chromium, hexavalent (and compounds) including but not limited to": Barium chromate, Strontium chromate and others.)
Wunna Aung	10:58:09 AM PDT	Appendix E - Crematoria with new thresholds of any bodies cremated. Based on toxic emission and receptor proximity, the prioritization scores are low. Do those types of facilities need to report for example every year, or every four year or just only once when the District accessed the prioritization scores?
Betty Chu	10:59:29 AM PDT	Is this a separate report or is this reported using the CARB tool that will be developed for AB617?
Hemant amin	11:00:38 AM PDT	Appendix E mention, crematoria any amount of bodies. What about any incinerator burning Hazardous waste need to provide any reporting?
Kyle Melching	11:01:19 AM PDT	With the expansion of the listed toxic to be reported with facilities that have reported their way out of the AB2588 programs (prior score less than 1); will they then have to restart this process again. Or will the CTR help Districts identify what facilities have to be reintroduced to the AB2588 program?

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Steven Yang	11:02:10 AM PDT	Will ARB require reporting of compounds when emissions cannot be detected, but the detection limits are of a value that if reported would result in emissions above a health risk threshold? This poses a "health risk" problem that may not actually exist and for which a facility is neither responsible nor can correct.
Gary Jones	11:13:28 AM PDT	Sorry, the answer for printing operation reporting was not clear. Is it not clear what has to be reported if a facility is over the threshold. Do they report on all of the chemicals on the list or chemicals used on the list over the threshold?
Joy Williams	11:13:29 AM PDT	Thank you, good workshop and materials.
Laura Rosenberger Haider	11:14:45 AM PDT	Chromium was categorized as allergenic & immunotoxic by Environmental Working Group. Chromium is one of the 3 most common metal allergens. Allergens can lead to skin lesions and insect attacks and infections. Treatments decrease the immune system and have health risks.
David Nicholas	11:15:31 AM PDT	Will the updated diesel engine requirements XI require diesel engines with less than 50 horsepower to be permitted and inventoried, or does that just become an option for air districts? Will there be a revised ATCM for this?
Truc Ngo	11:17:47 AM PDT	Would baghouse control PAH and VOC emission, considering most PAH constituents have boiling point b/w 200 to 400 C and therefore would remain as solid or liquid forms at the baghouse 's normal temperature of well below 200 C. In other words, hardly any volatile PAH or VOC would escape from the Baghouse to the Stack?
Kyle Rohlfing	11:20:21 AM PDT	I had heard that CARB was moving away from using the HAPR EIM to using a web portal for facilities to report emissions. Has this changed?
Rob Cram	11:22:41 AM PDT	Hello-Rob Cram with Holt of California. Just to clarify- regarding reporting- will the local Air District with jurisdiction over a business in question be contacting the business on how/when to report or does the business need to reach out to the Air District?
Gary Jones	11:24:02 AM PDT	Are the thresholds for reporting based on use of material or emissions? Use does not always equate into emissions.
Gary Jones	11:25:04 AM PDT	Is there a document that justifies the applicability thresholds that have been determined for each identified category?

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Gene Starks	11:28:11 AM PDT	I am a new crematory manager in Santa Clara County. If i have any questions concerning air quality should i reach out to the district that handles our crematory.
Edward Krisnadi	11:29:55 AM PDT	I have heard that CARB plans to utilize a default reference exposure level for risk assessment for chemicals added to the list but for which not enough data had been compiled to develop a specific REL. Is this true? If so, what is this default REL? Can you give an example of a chemical treated in this manner?
Nicole Beaulieu	11:30:17 AM PDT	Hello - is there information available on the cost of these regulatory updates and predicted emissions reductions that may be achieved?
Samuel Oktay	11:32:43 AM PDT	The proposed changes will cause a significant increase in manpower requirements at the District level. What are the revenue streams that will be available to implement the requirements at the level needed. Samuel J Oktay, PE MDAQMD
Wunna Aung	11:33:26 AM PDT	Wastewater Treatment Facilities - If those facilities did pooled source test a number of years ago. Then, they used those toxic emissions to do HRA and HRA results show intermediate priority which requires the facilities to update every 4 years. Because of this new amendments, can those facilities still use their existing toxic emission factors to report?
Laura Rosenberger Haider	11:33:44 AM PDT	Uranium dust could become an increasing problem. 17 water connections in Kern County exceed the limit for uranium and the proposed new fracking might worsen this and crops might be spray irrigated with this water.
Adam Harper	11:41:48 AM PDT	Table A-3 identifies "Permitted process" Does this refer to air district permitted process?
Neal Davenport	11:41:52 AM PDT	please clarify. presuming CARB adoption of these guideline changes later this year, is the first applicable data year up to the full discretion of each air district?
Adam Harper	11:42:57 AM PDT	previous question is in reference to appendix e - table a3 document.
Dennis Chappell	11:43:37 AM PDT	is the 5 hours for a one time use/ per month/ per day / per year? for the standby generators
Truc Ngo	11:44:52 AM PDT	How do we get a copy of this webinar's contents plus its audio recording? Would the recording also include the Q&A portion? Do we need to request or it will be automatically sent in email? I found this webinar to be very helpful & informative.
Dennis Chappell	11:45:42 AM PDT	if we don't run the unit is there still a emission factor ?

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Michael Choi	11:49:15 AM PDT	Would tailpipe emissions from diesel construction equipment be included?
Truc Ngo	11:53:17 AM PDT	Also, Is there a closed caption feature for this webinar?
Greg Stevenson	11:53:53 AM PDT	Will atmospheric Nitrogen emissions from agricultural fertilizer use be assessed and reported?
Amy Kyle	11:53:56 AM PDT	Thanks for bringing up my question. However saying that facilities can work with suppliers is not an answer. It sounds like no one is responsible for this. It is not only how things are grouped together but also use of trade names without disclosing ingredients. You don't need to read this on the conference call but please include it in the record.
Todd Osterberg	11:56:21 AM PDT	Todd Osterberg: As reporting is only required for emissions which occur at stationary sources, doesn't this misrepresent the risk to the public given that large emissions sources such as construction sites are not included? Particularly in so far as many of these sources may be in closer proximity to the public.
Laura Rosenberger Haider	11:58:36 AM PDT	Tractor dust in some areas is more toxic. 168 water systems in CA incurred violations of the maximum concentration level for chromium. Recent animal studies link hexavalent chromium to lung cancer.
Neal Davenport	12:12:18 PM PDT	John just answered my question. you can discard my previous question related to "applicable data year"
Christopher Chavez	12:17:42 PM PDT	Chris Chavez, Coalition for Clean Air. I just wanted to state our support for the concepts behind the update and the effort to maximize emissions reductions and protect public health.
Truc Ngo	12:26:32 PM PDT	Does CARB offer HARP's EIM training anywhere?
N Nagaraj	12:28:46 PM PDT	You mentioned a new online system, will that include procedures for bulk data uploads in xml or JSON? Please consider RESTful posts for bulk data
Amy Kyle	12:31:14 PM PDT	The explanation of thresholds does not make sense. How can you decide whether emissions will pose health concerns if you do not consider cumulative impacts? Please recall that the whole point of AB 617 is to reduce emissions at the community level and not to treat every facility as entirely separate. This is also in the statutory language of AB 2588, though not implemented as yet by CARB.
Nicole Beaulieu	12:31:56 PM PDT	Thank you!
Natasha Meskal	12:42:24 PM PDT	Could you please let us all know
Russ Bennett	12:46:29 PM PDT	Thank you.

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Alana Mathews	12:46:53 PM PDT	thanks
Natasha Meskal	12:46:55 PM PDT	About the training
Natasha Meskal	12:47:02 PM PDT	Thank you